

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

3M COMPANY,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 1:11cv627
)	(TSE/JFA)
CHRISTIAN INVESTMENTS LLC, D/B/A)	
PROTECTED DOMAIN SERVICES, et al.,)	
)	
Defendants.)	

**PLAINTIFF'S MOTION FOR CLARIFICATION
AND WAIVER OF ORAL ARGUMENT ON THIS MOTION**

COMES NOW the Plaintiff, 3M Company, by counsel, and respectfully requests clarification from this Honorable Court regarding the Court's ruling at the Status Conference held in this case on August 12, 2011 (the "Status Conference").

1. The reason for this motion for clarification is that the Minute Entry published to the parties with respect to the Status Conference does not comport with the recollection of counsel for the Plaintiff as to the actual order that this Honorable Court indicated it intended to issue. *See* Docket Entry 57.

2. In particular, both counsel recall that the Court extended the TRO for an indefinite period of time (which, by definition, would be limited to 14 days under Fed. R. Civ. Pr. 65(b)(2)) pending review of Plaintiff's request to convert the TRO into a preliminary injunction as to all

Defendants in this case. The Court also requested supplemental briefing from Plaintiff, by 12:00 p.m. on August 18, 2011, as to Plaintiff's position concerning its view of the best case for personal jurisdiction over each of the defendants.

3. While the Court indicated that it hoped that Plaintiff, Asia Netcom Asia Pacific Ltd. d/b/a Pacnet, GoDaddy.com, Inc. and Domains By Proxy, Inc. would quickly resolve their disputes by filing consent judgments, it did not set a specific time limit for any such resolution to occur.

4. Notwithstanding the foregoing, the minute entry published on August 12, 2011 states that "TRO will be extended pending the filing of the Consent judgment by the parties by noon on Thursday." Exh. A. It does not mention any briefing or briefing deadlines.

5. Counsel for Plaintiff believe that any order issued by this Honorable Court should clarify that: (1) the TRO previously entered in this matter is extended indefinitely, but not more than 14 days, pending action by the Court with respect to Plaintiff's motion for entry of a preliminary injunction as to all defendants and (2) Plaintiff shall file a memorandum of points and authorities, and any supporting evidence, discussing its view as to the best case for personal jurisdiction over each defendant herein, as currently known to Plaintiff, by 12:00 p.m. on August 18, 2011.

WHEREFORE, the foregoing premises considered, Plaintiff respectfully requests clarification of this Honorable Court's rulings on August 12, 2011. Furthermore, in light of the nature of this motion, there is no need for oral argument on this motion and any such right is hereby waived.

Plaintiff appreciates the Court's consideration of these matters.

DATED: August 15, 2011.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of August, I have filed a true and correct copy of the foregoing with the Clerk of Court via the CM/ECF efile system, which will send notification to all counsel of record; and have served a copy via United States mail, postage prepaid to the following Defendants:

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